



THE EPA NEW ENGLAND ENVIRONMENTAL JUSTICE ACTION PLAN FOR FISCAL YEARS 2001 AND 2002

OCTOBER 1, 2001

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Executive Summary

One of EPA New England's highest and most challenging priorities is to promote Environmental Justice (EJ) to ensure that the citizens of Connecticut, Massachusetts, Maine, New Hampshire, Rhode Island, and Vermont all enjoy an equal measure of environmental protection. EPA New England acknowledges that, notwithstanding differences in race, color, national origin, and income, everyone strives for a better quality of life, including a safer and healthier living environment for their family, community, and future generations. EPA New England also recognizes that it must increase its involvement and attention to minority and low-income communities in its decision-making processes. Many of these communities may not have the access or resources to get their concerns addressed, even when they suffer a disproportionate impact from environmental pollution or threats to public health.

EPA defines EJ as the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. Fair treatment means that no group of people, including any racial, ethnic, or socioeconomic group, should bear a disproportionate share of the negative environmental consequences resulting from industrial, municipal, and commercial operations or the execution of federal, state, local, and tribal programs and policies.

In January 1993, EPA New England became the first EPA Regional office to issue an Environmental Equity policy to address what is now commonly referred to as EJ. Since then, the Region has made a significant amount of progress to address and respond to EJ issues and concerns by making fundamental changes in the way our everyday work is carried out. By taking a more proactive approach, we have been able to foster strong partnerships with New England citizens to identify and resolve many of the environmental concerns which most impact their quality of life and health. However, there is more we can –and must– do to bring justice to citizens who may be disproportionately affected by pollution.

To continue to build on past accomplishments, EPA New England is working to make sure that EJ considerations are factored into the environmental decisions we make, programs we implement, and projects and initiatives we undertake. Clearly, our staff needs a keen understanding of EJ in order to connect how their work helps to ensure that all citizens in New England receive fair and equal environmental protection.

To accomplish this goal, the Region is revising and reissuing as part of this Action Plan the Regional Environmental Justice Policy. As further evidence of that commitment, the Office Directors established the Environmental Justice Council, charged with the responsibility of developing EJ policy, guidance, and implementation strategies to institutionalize EJ activities throughout the Regional Office. The Office Directors delegated the responsibility for this effort to their Deputies in order to ensure top management support. The EJ Council is comprised of the Deputy Office Directors and staff from each of the six program and administrative offices in the Region, and is chaired by the Director of the Office of Civil Rights and Urban Affairs.

The top priority of the EJ Council has been to develop an EJ Action Plan for fiscal years 2001-2002 and beyond, which reflects our ongoing and future efforts to:

- Educate and train our staff to increase their knowledge and understanding of EJ and provide them with new tools to identify EJ communities and to factor EJ into their everyday work;
- Engage principal partners such as community-based organizations, public health organizations, and federal, state and local governments, to broaden our efforts to understand, identify, and resolve EJ issues and concerns;
- Meaningfully involve our community partners as early as possible in the Region's environmental decision-making;
- Increase communication about EJ with both internal staff and outside stakeholders by use of the internet and other traditional communication tools, highlighting EJ-related activities and success stories and other relevant information;
- Develop and provide program-specific EJ guidance to all Regional program offices, in priority areas such as: Enforcement and Inspections, Permitting, Performance Partnership Agreements, State Delegations, and Public Participation;
- Create an inventory of ongoing and existing EJ projects, programs, initiatives and activities, and house them in a user-friendly data base accessible to all Regional staff;
- Include EJ in the annual strategic planning process for fiscal year 2002 and beyond; and
- Evaluate the effectiveness of our institutionalization efforts and continuously improve on our successes.

The EJ Policy, EJ Action Plan, and EJ Implementation Strategies which follow all reflect the Region's commitment to ensuring that our resources are allocated in a way that best serves the public and provides a better quality of life and health to all citizens of New England.

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CHAPTER 1 - BACKGROUND ON ENVIRONMENTAL JUSTICE

A. HISTORY LEADING TO AN ENVIRONMENTAL JUSTICE POLICY

During the 1980s, EPA became concerned that some racial, ethnic, and socioeconomic groups were suffering a disproportionate share of negative environmental burdens. EPA New England responded by chartering an Environmental Equity Council which, in 1993, developed and issued the first Environmental Equity Policy in the nation. Shortly afterwards, the States of New Hampshire and Connecticut followed suit with the promulgation of the first State Environmental Equity Policies.

Since the 1980s the idea both federal and state governments embodied in their Environmental Equity Policies has been redefined to mean that no group of people, including any racial, ethnic, or socioeconomic group, should bear a disproportionate share of the negative environmental consequences resulting from industrial, municipal, and commercial operations or the execution of federal, state, local, and tribal programs and policies. This idea is now more commonly called Environmental Justice (EJ), and new Environmental Justice Policies have replaced those promoting Environmental Equity.

What follows is the EPA New England Regional Policy on Environmental Justice. This Policy sets the parameters and framework against which the Region developed this EJ Action Plan, with specific implementation strategies designed to institutionalize EJ in our daily work.

B. EPA NEW ENGLAND REGIONAL POLICY ON ENVIRONMENTAL JUSTICE

Introduction: EPA New England is committed to promoting and supporting Environmental Justice. Environmental Justice (EJ) is the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. Fair treatment means that no group of people, including racial, ethnic, or socioeconomic groups should bear a disproportionate share of the negative environmental consequences resulting from industrial, municipal, and commercial operations or the execution of federal, state, local, and tribal programs and policies.

EPA New England (EPA NE) personnel shall consider questions of EJ in all Regional activities including employment, education and outreach, regulatory activities, data management, enforcement, contracts and grants, communications, and planning. In addition, within the EPA NE office work planning processes, management will systematically evaluate ongoing efforts to ensure an appropriate, continuing focus on EJ and will implement procedures to address EJ issues.

Employment: EPA NE policy is to recruit, hire, promote, train, and transfer individuals of diverse background within all levels of EPA so that the composition of EPA New England reflects the diversity of the people it serves. Such a policy facilitates decision making that reflects a broad range of experience and understanding and takes into account diverse views and perspectives.

Education and Outreach: EPA NE policy is to foster a heightened awareness of EJ issues, both within EPA, and among those most threatened by environmental risks. The Region will develop and implement environmental justice training, will promote increased communication of EJ issues in a manner that has a measurable impact on affected communities and will provide general environmental education to targeted populations. EJ training will be mandatory for all EPA NE staff and will part of the core curriculum for new employees joining the Region.

Regulatory Activities: EPA NE policy is to maximize the use of EPA's statutory authority and practical influence to protect public health and the environment in a manner that openly addresses EJ. Regional programs will incorporate EJ into all aspects of their work with local, State, and federal agencies, will encourage interagency cooperation with respect to EJ issues and will provide opportunities for meaningful participation in our environmental decision making and program implementation for all external stakeholders down to the local government and neighborhood levels.

Data Management: EPA NE will ensure that programs have access to the information and analytical support necessary to successfully identify, evaluate, and resolve EJ issues in New England. Our goal is to provide access to, and ensure use of, relevant information to assess and address EJ.

Enforcement: EJ principles will be one of the factors considered by regional enforcement personnel in establishing enforcement priorities and targeting enforcement actions. Regional personnel will

encourage the regulated community to address EJ in the settlement of enforcement cases, including the use of Supplement Environmental Projects or “SEPs”.

Contracts and Grants: EPA NE will routinely promote and support EJ through Regional contracts and grants. Routine consideration of EJ through contracting and grant policies and procedures will significantly increase our opportunities to promote EJ outreach to contract and grant recipients.

Communications: EPA NE will improve and expand its communications effort by endeavoring to keep citizens and stakeholders, especially those in minority and disadvantaged communities, abreast of emerging Regional and Headquarters policy. The Region recognizes the sensitivity and concern that issues such as risk assessment, risk management, and risk communication present to racial minorities and low income communities. Towards this end, EPA NE will seek to enhance outreach and communication activities by encouraging participation by minority and disadvantaged communities in those activities and will use the internet and other more traditional communication tools to reach out to our external constituencies.

Planning: Implementation of this Environmental Justice Policy will be incorporated into the Regional Strategic Planning framework and progress will be monitored through the midyear and annual assessment process.

Review Mechanism: The Regional Administrator shall ensure that EJ issues and goals are being met through a regular review process that includes evaluation of Regional strategic planning and individual office work planning and any other activities deemed necessary by the Regional Administrator. The Office of Civil Rights and Urban Affairs shall act as the Regional Administrator’s representative in ensuring that EJ issues and goals are addressed in a timely and effective manner.

This Policy supercedes the January 16, 2001 Regional Policy on Environmental Justice and is effective immediately.

CHAPTER 2 - EPA NEW ENGLAND ENVIRONMENTAL JUSTICE ACTION PLAN

A. INTRODUCTION

In an effort to further energize EPA New England's EJ program, during the Fall of 1999 the Office Directors chartered an Environmental Justice Council, whose goal is to institutionalize EJ principles and philosophy in the Region's everyday program activities. The first order of business for the EJ Council was the development of a Regional Environmental Justice Action Plan. The Action Plan that follows is made up of six independent yet related strategies designed to institutionalize EJ in the Regional Office and build even stronger relationships and leveraging opportunities with our external constituencies. These six strategies -Communications, External Stakeholder Engagement, Mapping, Organizational Engagement, Training, and Evaluation - when fully implemented, will increase staff awareness of EJ; provide the necessary tools and guidance to enable staff to better understand and address EJ issues through their day-to-day work; and create a communications network that will improve our ability to showcase program successes, make information available to those who need it, and get our EJ message out. Workgroups, comprised of EJ Council staff, developed these six strategies and are responsible for their implementation, working with other EJ Council members and, as necessary, staff from elsewhere in the Region.

B. COMMUNICATION STRATEGY

GOAL:

To effectively convey information about EJ issues, policies, programs, and results to the widest audience possible, including the public, state and local governments, and EPA staff.

APPROACH:

To reach a wide audience a combination of media, including the web and more traditional tools, will be used to inform stakeholders and EPA Staff about EJ activities.

- ▶ The existing EPA New England EJ website will be enhanced by adding links to related sites and increasing content regarding EPA policies, guidance and supporting information, as well as specific EJ programs and contacts.
- ▶ Success stories about EJ programs, including grants and various other initiatives, will be highlighted on the web.
- ▶ The website will be updated quarterly.
- ▶ A newsletter will be published quarterly and distributed to the more than 1200 community-based organizations, health services groups, academic institutions, and individuals on EPA New England's mailing lists. This is key to reaching many of our most important stakeholders—especially people in minority and low-income communities— that may not have internet access.

The long term viability of the website and the newsletter will be one of the EJ Council's highest priorities because of their potential to reach such wide audiences. Effective communication is essential for the success of many other parts of the Action Plan, and more specific communication goals have been included in each of the other strategies.

1	EJ website quick hits/links <ul style="list-style-type: none">▶ Establish link from EPA Headquarters homepage to ours▶ Post EJ Council membership▶ Post EJ P2 Grant opportunities▶ Post regional EJ Policy

2	Office/program reps participation <ul style="list-style-type: none">▶ Offices identify reps▶ Reps provide web site feedback via coordination with office - use inventory as a resource▶ Communication Workgroup screens site feedback▶ Communication Workgroup presents web site ideas/recommendations to EJ Council▶ Post office feedback to the Web
3	Post Office success & interesting stories on website <ul style="list-style-type: none">▶ Hire a summer intern (write pd, submit to ECO, interviews by R. Harrington and J. Younger)▶ Offices conduct basic research for stories - use inventory as resource▶ Write up stories▶ Communication Workgroup edits stories▶ Final review by EJ Council▶ Post stories
4	Future site updates <ul style="list-style-type: none">▶ Update website▶ Update website▶ Update website▶ Update website
5	Create and publish a quarterly EJ Newsletter <ul style="list-style-type: none">▶ First edition of the EJ Newsletter▶ Second edition of the EJ Newsletter▶ Third edition of the EJ Newsletter▶ Fourth edition of the EJ Newsletter
6	Evaluation <ul style="list-style-type: none">▶ Identification of measures▶ Collection of data▶ Production of an evaluation report

C. EXTERNAL STAKEHOLDER ENGAGEMENT STRATEGY

GOALS:

1. To educate and change behavior and actions to ensure that Environmental Justice is an integral part of our external partners' roles and responsibilities.
2. To select two external partner groups to work with in FY01, to enhance our mutual Environmental Justice efforts and mission, and identify appropriate and relevant projects to further Environmental Justice.
3. To evaluate the effectiveness of partnership and building/enhancement activities in FY02, and select another set of external groups for this same purpose to carry into FY03.

APPROACH:

Work planned for this 2-year External Stakeholder Engagement Strategy requires an examination of the FY01 office-by-office inventories as a primary first step. This is necessary to identify appropriate and realistic opportunities for building and enhancing our EJ message through partnerships with external organizations. The success of our efforts in Organizational Engagement will be a springboard toward building more effective partnering with external audiences, in selecting good EJ projects, and agreeing to a common EJ mission or concepts. While the External Stakeholder Engagement Strategy will identify some simple, nonresource-exhausting action items to undertake in FY01 and early FY02, the bulk of action items for the External Stakeholder Engagement Strategy, particularly in reaching out to develop new partnerships with external groups, will be planned for in FY02/1st and 2nd quarter and be implemented for the most part in FY02/3rd quarter. This is a prudent and realistic approach given that a new Regional Administrator has just come on board and recognizing that EPA's resources overall are diminishing.

1	Examine FY01 Office-by-Office Inventories to identify appropriate opportunities and key action items for carryover into FY02 External Stakeholder Engagement Strategy (ESE) <ul style="list-style-type: none">▶ Review inventories and examine for opportunities that should carryover into the ESE FY02 Plan▶ Update Deputies/ EJ Council on suggested action items▶ Include these in FY02 Inventory

<p>2</p>	<p>Communicate a consistent, ongoing message to all external partners</p> <ul style="list-style-type: none"> ▶ Develop standard language/script for agency speakers (Collect & use existing documents, e.g. Training Collaborative) ▶ Develop information on what we are doing, how we can help, and a record of our successes ▶ Post information on website ▶ Provide education/training for external partners (Use script info developed by National Training Collaborative; Regional EJ speakers bureau can assist w/outreach)
<p>3</p>	<p>Build/enhance partnership with Regional environmental agencies</p> <ul style="list-style-type: none"> ▶ Discuss EJ issues with EPA/State Title VI Workgroup, and identify action items for FY02 work plans ▶ Enhance existing EPA/State cooperative efforts to incorporate EJ issues and ID work for FY03
<p>4</p>	<p>Build/enhance partnership with local municipal and community groups</p> <ul style="list-style-type: none"> ▶ Create workgroup to begin organizing two Community Group Forums for late Spring 2002 & early Fall 2002 (target one forum to municipal planning groups on comprehensive planning tools) ▶ Create draft agenda, identify speakers and identify co-sponsors e.g. state, 1-2 host community group(s) ▶ Work w/facilities staff re: finding/securing facilities, mailing, program development, etc. ▶ Mail invites to community groups, etc. ▶ Host 1st Community Group Forum ▶ Evaluate 1st Forum; tweak agenda for 2nd Forum as needed and begin to create list of action items and projects ▶ Mail invites for 2nd Forum ▶ Host 2nd Community Group Forum ▶ Evaluate 2nd Forum and create list of action items and projects suggested at both Forums, include in FY03 Action Plan ▶ Post Forum news and other items of Interest on EJ website
<p>5</p>	<p>Build/enhance partnership with selected federal partners</p> <ul style="list-style-type: none"> ▶ Strengthen existing HUD/EPA partnerships in FY02 to address EJ issues, e.g. funding for lead remediation ▶ Identify key federal agencies/contacts ▶ Design and hold EJ Roundtable w/selected federal partners ▶ Identify several action items for cooperation in FY03 ▶ Evaluate efforts & identify improvement opportunities

6	Build/enhance partnership with State public health agencies <ul style="list-style-type: none">▶ Develop a letter to Commissioners/HHS to gain buy-in and invite participation in roundtable to meet/discuss partnering opportunities; identify common goals & past accomplishments in addressing EJ problems (lead, asthma, etc.)▶ Hold Roundtable w/key contacts (Also discuss EJ message to local BOHs)▶ Identify opportunities & action items▶ Evaluate efforts & identify improvement opportunities
7	Evaluation: review approaches with 2 selected external groups in FY01/02; review lessons learned and follow-up items; and select new groups for emphasis in FY02/03 <ul style="list-style-type: none">▶ Staff/managers solicit feedback from external partners on what worked/what didn't▶ EE workgroup meet with staff/managers who worked with selected partners to review +/- on what worked/didn't to date.▶ Review proposed future work with selected partners▶ Select new external organizations to work with in FY03▶ Obtain feedback on new work and finalize FY03 activities

D. MAPPING STRATEGY

GOAL:

To develop a computer-based Environmental Justice mapping tool covering all six New England States and accessible to EPA New England personnel through their desktop PC. Provide useful data regarding Environmental Justice issues such that EJ becomes better incorporated into the day-to-day work of the Region.

APPROACH:

The work of the Mapping Workgroup includes, as a first step, surveying other EPA Regions, Headquarters, and some states to learn about mapping tools currently in use, in particular, how they operate and how they are incorporated into routine work. In light of the survey data as well as existing EJ policy and practice, the workgroup will create a ranking system to accompany the mapping tool along with a brief users guide for personnel looking to employ the tool. The computer-based tool, itself, will then be developed and introduced or “rolled out” to those in EPA New England. Finally, a process for measuring or monitoring the effectiveness of the mapping tool will be put in place to gauge the need for future refinements or enhancements.

1	Perform Survey Of Other EJ Tools
2	Establish EJ Tool Methodology <ul style="list-style-type: none"> ▶ Research and choose statistical method for determining reference value ▶ Assign minority status to block groups ▶ Assign low income status to block groups ▶ Address pop. density and other data layers as overlays
3	Prepare Brief User’s Guide <ul style="list-style-type: none"> ▶ Purpose of tool ▶ Relation to EJ Policy ▶ What mapping shows, what mapping doesn’t show ▶ Describe ranking system ▶ How tool compares with others ▶ Examples (sample uses/users)

4	Create Mapping Tool <ul style="list-style-type: none">▶ Choose software▶ Write code▶ Test/troubleshoot▶ Push out to desktops
5	Introduce Tool <ul style="list-style-type: none">▶ Design communication strategy▶ Develop training plan▶ Schedule training▶ Implement roll-out
6	Measure Performance <ul style="list-style-type: none">▶ Evaluate tool

E. ORGANIZATIONAL ENGAGEMENT STRATEGY

GOALS:

1. To ensure that Environmental Justice is on the table as EPA New England carries out its strategic planning efforts and is considered by each Office as it does its operational planning.
2. To ensure that all staff and managers understand the concept of Environmental Justice and how, through their work or through their interactions with others, they can have an impact on EJ.

APPROACH:

Organizational engagement is one way of characterizing the institutionalization of the EJ principle in EPA New England. It calls for the engagement (i.e., active participation) of staff in the issue in two distinct ways:

- ▶ By maximizing the incorporation of EJ principles into EPA New England’s strategic planning process and into individual Office operational planning; the former through the Region’s Strategic Planning framework and the latter through work plan development; and
- ▶ By getting staff and managers more “sensitized” to EJ issues, that is, by making EJ real to them in terms of their every day work and how in their work they can impact the issue.

1	Incorporate EJ into the strategic planning process <ul style="list-style-type: none">▶ Convene a meeting of the EJ Council & SPO▶ Develop a plan to implement agreements reached▶ Review/approval of draft plan by EJ Council▶ Implement final plan

2	Develop understanding of the EJ-related work of EPA New England (EJ Activity Inventory) <ul style="list-style-type: none"> ▶ Finalize EJ Inventory, FY'01 ▶ Initiate development of FY'02 inventory ▶ Update EJ Council on status of inventory for FY'02 ▶ Finalize EJ Inventory for FY'02
3	Develop FY02 office specific functional discussion papers to document the extent EJ was considered in operational planning <ul style="list-style-type: none"> ▶ Draft functional discussion papers and distribute copies to the EJ Council ▶ Update EJ Council on discussion papers ▶ Prepare final functional discussion papers and append to Action Plan
4	Develop office-specific communication plans to inform staff of strategies, approaches and their EJ responsibilities <ul style="list-style-type: none"> ▶ Draft Communication Plan ▶ Update EJ Council draft plan ▶ Develop & implement final plan
5	Establish accountability for incorporating EJ into operational planning through Diversity CJE for Deputy Office Directors <ul style="list-style-type: none"> ▶ Develop & present draft CJE measures to EJ Council ▶ Develop final CJE measures ▶ Incorporate final measures into the Diversity CJE
6	Establish Regional EJ Honor Award for CY01 & beyond <ul style="list-style-type: none"> ▶ Develop award criteria ▶ Review/approve of criteria by the EJ Council ▶ Brief Human Resources Council ▶ Finalize award criteria

7	<p>Prepare EJ lesson learned paper based on experiences of UEI and Urban Team</p> <ul style="list-style-type: none"> ▸ Discuss/agree on the need for a paper ▸ Outline paper ▸ Review/comment - EJ Council ▸ Draft paper ▸ Review/comment - EJ Council ▸ Approve final draft - EJ Council ▸ Distribute to all EPA ▸ Briefing with question/answer/discussion
8	<p>Conduct EJ tours (learning & community service events)</p> <p>Community Service Event</p> <ul style="list-style-type: none"> ▸ Preliminary discussion with Earth Day Community Service Event Organizers ▸ Discussion/approval of approach by EJ Council ▸ Review/approval of plan & time line by EJ Council <p>Learning Event</p> <ul style="list-style-type: none"> ▸ Agree to sponsor an event - EJ Council ▸ Obtain HRO concurrence on staff participation ▸ Agree on criteria for site selection/logistics - EJ Council ▸ Select location ▸ Engage participating community groups ▸ Submit straw proposal/communication plan to EJ Council for approval ▸ Implement communication plan ▸ Secure transportation/other logistical needs ▸ Conduct event ▸ Communicate result to the Region
9	<p>Develop function specific guidance in preparation for training staff on the “hows” of EJ. (May be multi-office workgroups depending on function.)</p>
9a	<p>Develop Authorization/Delegation Guidance</p> <ul style="list-style-type: none"> ▸ Submit implementation schedule ▸ Form workgroup/develop an Action Plan ▸ Develop and discuss interim guidance ▸ Develop final guidance ▸ Develop schedule for conducting staff training

9b	Develop Environmental Education Guidance. <ul style="list-style-type: none"> ▸ Submit implementation schedule ▸ Form workgroups ▸ Develop interim guidelines ▸ Review and discussion of interim guidance by EJ Council ▸ Develop final guidance ▸ Develop schedule for conducting staff training ▸ Complete function specific discussions
9c	Develop Grants and Contracts Guidance <ul style="list-style-type: none"> ▸ Submit implementation schedule ▸ Form workgroup ▸ Develop interim guidelines ▸ Review and discussion of interim guidance by EJ Council ▸ Develop final guidance ▸ Develop schedule for conducting staff training ▸ Complete function specific discussions
9d	Develop Integrated Inspection, Enforcement and Assistance Guidance <ul style="list-style-type: none"> ▸ Submit implementation schedule ▸ Develop interim guidelines ▸ Review and discussion of interim guidance by EJ Council ▸ Develop final guidance ▸ Develop schedule for conducting staff training ▸ Complete function specific discussions
9e	Develop Permitting Guidance <ul style="list-style-type: none"> ▸ Submit implementation schedule ▸ Form workgroup ▸ Develop interim guidelines ▸ Review and discussion of interim guidance by EJ Council ▸ Develop final guidance ▸ Develop schedule for conducting staff training ▸ Complete function specific discussions

9f	Develop Performance Partnership Agreement Guidance <ul style="list-style-type: none"> ▸ Development of PPA expectations ▸ Form workgroups ▸ Solicit Regional or National Guidance ▸ Develop draft guidelines ▸ Review by Stakeholders ▸ Develop final Guidance ▸ Training/outreach to Staff
9g	Develop Public Participation Guidance <ul style="list-style-type: none"> ▸ Work with the Regional Public Involvement Liaison to insure collaborative efforts in integrating Public Involvement and EJ Policies into regional programs ▸ Solicit stakeholder feedback on public involvement with at least one under represented group as part of the regional stakeholders input meetings ▸ Deliver module on Public Involvement policy as part of EJ awareness curriculum
9h	Develop Waste Site Clean-up/Brownfields Guidance <ul style="list-style-type: none"> ▸ Submit implementation schedule ▸ Form workgroups for each major functional area ▸ Develop interim guidelines ▸ Review and discussion of interim guidance by EJ Council ▸ Develop final guidance ▸ Develop schedule for conducting staff training ▸ Complete function specific discussions
10	Establish an EJ Rotation program <ul style="list-style-type: none"> ▸ Obtain agreement by EJ Council to move forward with program ▸ Develop straw process ▸ Obtain approval from Deputy Office Directors ▸ Conduct briefing for/receive approval from Office Directors ▸ Implement pilot program
11	Evaluation <ul style="list-style-type: none"> ▸ Identification of measures ▸ Collection of data ▸ Production of an Evaluation Report

F. TRAINING STRATEGY

GOAL:

To increase understanding and awareness of Environmental Justice by EPA and State staff.

APPROACH:

The Training Workgroup will develop a plan to roll out the EJ Fundamentals Workshop to EPA New England staff and will partner with State agencies in New England to assist in the roll out to State staff. A first step in this process will be conducting a Pilot EJ Fundamentals Workshop in early autumn, 2001, which will be attended by EPA staff, State agencies staff, and representatives of various community groups in New England. The purpose of this pilot is to test the training curriculum before a variety of audiences for clarity, substance, effectiveness, and appropriateness. The New England Pilot is one of six being held across the country before a variety of audiences to seek feedback from multiple stakeholders prior to polishing and finalizing the workshop. Once the workshop is finalized, a plan will be developed to train EPA staff and begin a dialogue with the States aimed towards bringing the training to them. The Training Workgroup will identify a small number of EPA staff who will attend the annual EJ Training Collaborative's Train the Trainer Institute, to be held in the Fall of 2001. Staff attending the Institute will become the cadre of trainers who will provide high quality EJ training in New England that is consistent in content and presentation. In January 2002 the Region will conduct the first EJ Fundamentals Workshop.

1	Participate in the National EJ Training Collaborative
2	Pilot EJ Fundamentals Course <ul style="list-style-type: none"> ▶ Debut Pilot ▶ Develop Site visit Module ▶ Comment on Curriculum Modules ▶ Participate in Train the Trainer ▶ Conduct regional state focused workshop ▶ Feedback on Pilot Course

3	EJ Fundamentals Course <ul style="list-style-type: none">▸ Determine segments to be trained▸ Determine audience▸ Determine modules▸ Identify trainers▸ Train the trainers (5-10 trainers)▸ Establish dates for training▸ Roll out training▸ Evaluate training
4	EJ Awareness Course <ul style="list-style-type: none">▸ Identify trainers▸ Train the trainers▸ Establish curriculum▸ Roll out training▸ Include EJ Awareness training as part of core curriculum for new employees▸ Evaluate training
5	Meet with States to discuss EJ Training

G. EVALUATION STRATEGY

GOALS

1. To evaluate the impact and effectiveness of implementation of the EJ Action Plan, in terms of changing organizational culture and institutionalizing the environmental justice principle throughout EPA New England.
2. To determine the extent to which the EJ Action Plan has made a difference in the way the Region conducts its day-to-day activities.

APPROACH:

This strategy is intended to provide an overall evaluation of the success the Region has achieved in its implementation of the EJ Action Plan. To do this evaluation we will develop a set of measures that address the issue of institutionalization and culture change; the measures will be both activity and outcome based, with a bias for the identification and assessment of outcomes achieved through the EJ Action Plan. The evaluation done to support the five thematic EJ Action Plan Strategies (e.g., Communication and Training) will be a data source for this Evaluation Strategy.

1	Identify measures to be used in the evaluation
2	Create data collection tools
3	Establish baselines
4	Conduct FY02 evaluation <ul style="list-style-type: none">▸ Collect data (including thematic strategy evaluations)▸ Prepare evaluation report

H. CONCLUSION

While six independent strategies have been presented here, the ultimate success of this EJ Action Plan hinges on an implementation approach which is integrated and seamless. Successfully engaging our internal organization and building stronger relationships with our external stakeholders can only be achieved if, through the efforts of the EJ Training workgroup, we have effectively heightened staff understanding and awareness of environmental justice principles and philosophy. The desk top tools that will be put in place by the mapping workgroup are key to staffs ability to meet the goals and objectives of the functional guidance that will be developed as part of our Organizational Engagement Strategy. Communicating our successes, getting our message out and making information available to those who need it is the lynchpin which ties all of these efforts together. The synergy that can result from an implementation strategy which is integrated and well timed will be a major focus of the EJ Council as it carries out this Action Plan.

ATTACHMENT A - ENVIRONMENTAL JUSTICE COUNCIL MEMBERSHIP LIST



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5	Castagna, Kathleen	OCR	617-918-1429
6	Davis, Edgar	OSRR	617-918-1379
7	Fisher, Rich	OEME	617-918-8318
8	Greaves, Natasha	OCR	617-918-1815
9	Harrington, Veronica	OES	617-918-1703
10	Hatzopoulos, Athanasios	OSRR	617-918-1284
11	Hill, Pam	ORC	617-918-1092
12	Julien, Rhona	OES	617-918-1782
13	Levy, Gerry	OES	617-918-1702
14	Martinez, Hugh	OES	617-918-1867
15	Owens, James	OARM	617-918-1911
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Attachment A - Environmental Justice Council Membership List

	NAME	OFFICE	
20	Wysin, Davina	OES	617-918-1020
21	Younger, James	OCR	617-918-1061